

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

OUMAR TOURE

Plaintiff

v.

Uduak James Ubom and
Ubom Law Group, PLLC

Defendants

*
* **NOTICE OF REMOVAL FROM
THE CIRCUIT COURT OF THE CITY
OF RICHMOND, VIRGINIA**
* **Case No.: 760CL1003748-00**
*

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* **CIVIL ACTION NO.: 3:10CV744 (HEH)**
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PETITION FOR REMOVAL

Pursuant to 28 U.S.C.. Section 1441(a), the Defendants Ubom Law Group, PLLC, and Rev Uduak James Ubom, Esq. respectfully notices the removal of the above-captioned matter to this Honorable Court from the Circuit of the City of Richmond, Virginia, and as grounds therefor states the following:

1. On or about September 15, 2010, Defendants were served with Summons and Complaint in an action commenced by the Plaintiff Oumar Toure, in the Circuit Court of the City of Richmond, Virginia as Docket No.: 760CL1003748-00. True and correct copies of the Summons and Complaint are attached as Exhibit A. On October 5, 2010, defendants filed a Consent Motion For Extension of time to File An Answer. Exhibit B. No further proceedings have taken place in this action.
2. This Notice of Removal is filed within thirty days (30) days of the receipt of service by defendants. and therefore, is timely filed pursuant to 28 U.S.C.. Section 1446(b).

3. Pursuant to the Federal Rules of Civil procedure, the Petitioners have filed a written Answer to plaintiff's Complaint on October 13, 2010. Copies of defendants Answer and Notice of Removal are attached hereto and incorporated herein by reference as Exhibit C.

4. In his Complaint, Plaintiff Oumar Toure seeks judgment against defendants jointly and severally, for one Hundred Thousand Fifty Thousand (\$150,000.00) in compensatory damages, and judgment against Ubom for Fifty Thousand (\$50,000.00) in punitive damages, along with any other relief the ends of justice seem to meet.

5. At the time of the commencement of this action, Plaintiff was and is now a resident of the Commonwealth of Virginia.

6. At the time of commencement of this action, and at all other times relevant to the subject proceeding, Defendant Ubom Law Group, PLLC's principal place of business is District of Columbia, and is incorporated in the Washington, District of Columbia.

7. Moreover, at the time of commencement of this action, and at all other times relevant to the subject proceeding, Defendant Rev. Uduak James Ubom, was and is now a resident of the State of Maryland.

8. As this is a civil action wherein the amount in controversy exceeds \$75,000.00, exclusive of interest and cost, this Honorable Court has diversity of jurisdiction and citizenship over this matter pursuant to 28 U.S.C., Section 1332.

9. The Petitioner presents and files herewith a check in the amount of \$350.00 for the filing fees, as required by law.

WHEREFORE, the Defendants, Ubom Law Group, PLLC, and Rev. Uduak James Ubom, respectfully request to remove this action from the Circuit Court of the City of Richmond, Virginia, to the United States District Court, for the Eastern District of Virginia, in the interest of justice.

Respectfully submitted, .



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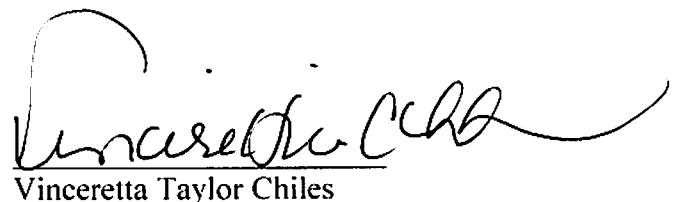


Rev. Uduak James Ubom, Pro Se
7600 Georgia Avenue, NW
Suite 410
Washington, DC 20012
(202) 723-8900
(202) 723-5790

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on October 15, 2010, I caused to be sent, a copy of the above Petition for Removal, by U.S. Postal service, postage prepaid to:

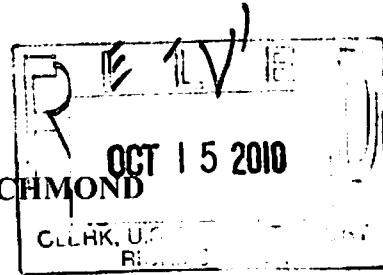
Joseph F. Grove
1900 Byrd Avenue, Suite 101
Henrico, VA 23230



Vinceretta Taylor Chiles

VIRGINIA

IN THE CIRCUIT COURT OF THE CITY OF RICHMOND



OUMAR TOURE

Plaintiff

v.

Uduak James Ubom and
Ubom Law Group, PLLC

Defendants

3:10cv 744 (HEH)

Case No.: 760CL1005748-00

NOTICE OF REMOVAL

TO THE CLERK:

Please note that the Defendants Ubom Law Group, PLLC and Rev. Uduak James Ubom, has filed a Notice of Removal, a copy of which is attached hereto, in the United States District Court for the Eastern District of Virginia, and respectfully states that no further proceedings may be held in this Honorable Court unless and until the above-captioned matter is remanded.

Respectfully submitted,

Vinceretta Taylor Chiles, VSB #39762
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Uduak James Ubom

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